

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

NEFTALI MONTERROSA, et al.,	:	
	:	
Plaintiffs,	:	
v.	:	Civil Action No. 2:20-cv-01563-TLN-DB
	:	
CITY OF VALLEJO, et al.,	:	
	:	
Defendants.	:	

STIPULATION

Immediately following the filing of this matter, the Court entered an initial scheduling order. (ECF No. 3.) Subsequently, the parties filed a joint status report and the defendants filed objections to the initial scheduling order. (ECF Nos. 13, 14.) In response, the Court issued an order extending discovery to 540 days from the date of the responsive pleading. (ECF No. 15.)

Since that time, the parties in this action have been actively engaged in discovery, including substantive document discovery and third-party subpoena practice. Discovery was delayed in part by the replacement of counsel for the plaintiff in May of 2021 and a delay in receiving the existing file from prior counsel. At present, deposition and expert discovery remain outstanding.

Additionally, counsel has been actively attempting to mediate a resolution to this matter. However, mediation has not been successful, and the parties require additional time to complete the necessary depositions in this matter.

The parties hereby stipulate that an extension of all deadlines by 150 days will serve the interests of justice by permitting the parties to complete the necessary remaining depositions and finalize expert materials. The parties further request the Court enter the attached order extending all deadlines.

The current discovery schedule is set as:

Discovery Cutoff:	9/16/2022
Expert Witness Disclosures	11/15/2022
Rebuttal Experts	12/15/2022
Joint Notice of Trial Readiness	01/17/2023
(If No Dispositive Motions Intended)	
Dispositive Motions	03/15/2023

The parties met and conferred and agreed to extend discovery dates 150 days and set case schedule as proposed below:

Discovery Cutoff:	02/13/2023
Expert Witness Disclosures	04/14/2023
Rebuttal Experts	05/15/2023
Joint Notice of Trial Readiness	06/13/2023
(If No Dispositive Motions Intended)	
Dispositive Motions	08/14/2023

IT IS SO AGREED:

/s/ John J. Coyle
John J. Coyle, Esq.
Counsel for Plaintiffs

/s/ Katelyn Knight
Katelyn Knight, Esq.
Counsel for City of Vallejo

/s/ Derek E. Konz
Derek E. Konz, Esq.
Counsel for Jarrett Tonn

Date: March 18, 2022

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Defendants.

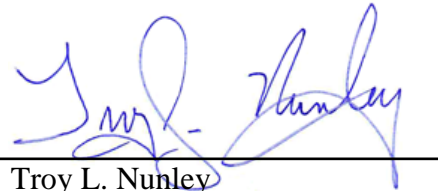
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ORDER

AND NOW, upon consideration of the parties' stipulation to extend all deadlines by 150 days, it is hereby ORDERED that the stipulation is APPROVED. All deadlines in this matter are hereby extended 150 days and the parties' proposed case schedule adopted.

DATED: March 23, 2022



Troy L. Nunley
United States District Judge